

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:)
)
MICHAEL W. BRADLEY) CHAPTER 11
) Bankruptcy No. 14-44687
Debtor.) Judge: Timothy A. Barnes

NOTICE OF MOTION

To: Shara C. Cornell
Manley Deas Kochalski
P.O. Box 165028
Columbus, OH 43216

On February 24, 2015 at 10:00 a.m./p.m. or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Timothy A. Barnes, in the courtroom usually occupied by him, located at Room 613, Everett McKinley Dirksen Building, 219 S. Dearborn, Chicago, Illinois, and present the enclosed Motion to Use Cash Collateral.

Michael Bradley, Debtor
4426 S. Greenwood Ave.
Chicago, IL 60653
(773) 269-1973

PROOF OF SERVICE BY MAIL

I, Michael Bradley, certify that I served this notice of motion and motion by mailing a copy to Shara C. Cornell, at the address above, by placing a copy of said motion of motion and motion in the U.S. mail at the U.S. Post Office, Adams and Dearborn, Chicago, Illinois, on the 9th day of February, 2015, with proper postage.

Date: February 9, 2015

Michael Bradley

Michael Bradley

FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
FEB 10 2015
JEFFREY P. ALLSTEADT, CLERK
PS REP. - NB

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APR. 14, 2014
PS RE

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COURT OF
ILLINOIS
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MOTION TO USE CASH COLLATERAL

Debtor, Michael W. Bradley, move that this Honorable Court allow him to use the cash collateral from the rents of the properties commonly known as 4013-15 S. Calumet, Chicago, Illinois, and 7747 S. Kingston, #2, Chicago, Illinois, pursuant to 11 U.S.C. 363 and any other applicable statutes.

1. In support of his Motion, Debtor states that he owns the subject properties and that Colfin Bulls Funding A, LLC is the creditor. Colfin Bulls Funding A, LLC, is the mortgagee for the premises commonly known as 4013-15 S. Calumet, Chicago, Illinois, 60653; 7747 S. Kingston, #2, Chicago, Illinois, 60649; and 4800 S. Champlain, Chicago, Illinois, 60615.
2. Debtor states that the Debtor is best able to manage, care for, and preserve the value of the subject properties.
3. The property 4013-15 S. Calumet is a six unit building for which Debtor pays for refuse collection, electric and water bills, and repairs to the six apartments.
4. The property 7747 S. Kingston, #2, is a condominium unit for which Debtor pays the assessments and manages repairs to the condominium unit.
5. The property 4800 S. Champlain is a single family residence for which Debtor manages, pays for repairs, utilities, and insurance.
6. Appointing a Receiver for the property will likely cause tenants to stop paying rent and/or move from the subject property, thereby creating vacancy and vandalism risks for the subject property, which may decrease the value of the property and creditor's interests in the subject properties.
7. Debtor is willing to pay to perform a monthly accounting and pay Colfin Bulls Funding A, LLC, and/or its assigns the balance of all rents collected after payment of necessary expenses of the buildings and to preserve the value of the properties.

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8. That for the month of January 2015, the first full month following the filing of this Case, Debtor collected rents totaling \$5,700.00 from the premises commonly known as 4013-15 S. Calumet, Chicago, Illinois, 60653 and \$1,000.00 from the premises commonly known as 7747 S. Kingston, #2, Chicago, Illinois, 60649.

9. That during the month January 2015, Debtor paid the following expenses: Water bill for 4013-15 S. Calumet in the amount of \$204.78; a Com Ed bill for the premises 4800 S. Champlain in the amount of \$115.21; furnace repair bills in the amount of \$130.00 and \$80.00 to MH Heating for 4013-15 S. Calumet, units 2N and 2S; a refuse collection bill to Flood Bros. in the amount of \$161.25; an insurance bill to State Farm insurance for 4013-15 S. Calumet and 4800 S. Champlain in the amount of \$175.58 and \$129.00 respectively.

10. That after deducting the expenses during the month of January 2015 from the amount of rent collected, Debtor has cash collateral of \$5,704.81, which Debtor is willing to pay to Creditor, Colfin Bulls Funding A, LLC, and/or their assigns.

Wherefore, Debtor moves that he be allowed to use the cash collateral from the subject properties and for such other relief as may be just.

Debtor Michael Bradley
Michael Bradley

Michael Bradley, Debtor
4426 S. Greenwood Avenue
Chicago, IL 60653
(773) 269-1973